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April 17, 2006

U.S. Environmental Protection Agency
(Air Docket No. EPA-HQ-OAR-2001-0018)
1200 Pennsylvania Avenue, NW
Mail Code: 6102T
Washington, DC 20460

Re: Proposed Rule -- Revisions to National Monitoring Regulations [71 FR 2710]

Dear Sir or Madam:

On January 17, 2006, the Environmental Protection Agency (EPA) published proposed revisions to the Ambient Air Monitoring Regulations [71 FR 2710]. The State of South Carolina, Department of Health and Environmental Control (SC DHEC) offers the following comments on the U.S. Environmental Protection Agency's (EPA's) proposed revisions.

In the Clean Air Act, Congress recognized that state and local air agencies are primarily responsible for preventing and controlling air pollution¹. As part of that responsibility, we recognize that regular review and revision of the National Ambient Air Quality Standards and the associated monitoring requirements are an important (and required) element of public health protection and environmental management. The distillation of the latest science and the knowledge gained since the last review into standards that protect, reference methods that measure and indicators that summarize is a monumental task, but the investigation, implementation, application and reporting of the standards and rules is the responsibility of the states. The observations, comments and suggestions of the states, programs and individuals that measure the progress and work with communities, facilities and governments to improve air quality must be given serious consideration. The final rules and regulations establish the foundation but should support, and not impede, our ability to do more, or better or what is appropriate for our region.

The expression of the regulations, from the broad concepts to, on occasion, the use of a few words, can have a significant impact on the ability of our state air program 'to protect and enhance the quality of the Nation's air resources so as to promote the public health and welfare...'² Please accept and consider these comments, both the broad and the focused, as opportunities to review the specific items commented upon and ultimately improve the applicability of the regulations and our ability to meet our responsibilities to improve air quality and protect public health.

¹ Section 101(a)(3).

² Section 101(b)(1).

[71 FR 2753 §50.1]

A probable typo noted in the definition of CO - 'Carbon Monoxideide'

[71 FR 2761 §53.34]

Although the definition for Class I equivalent method³ specifies PM_{2.5} and PM_{10-2.5}, there are no references to a test procedure for Class I PM_{10-2.5} methods in §53.34 or in Table C4. Is this an oversight or is it EPA's intent to not allow Class I equivalent methods for the PM_{10-2.5} monitoring?

[71 FR 2762 §53.35(b)(i)]

The limited number of locations (Los Angeles, northeastern or mid-Atlantic U.S. city and western U.S city) and seasons (winter only at the western city) may not be representative of Class III PM_{2.5} or PM_{10-2.5} monitor performance in the southeast U.S. SC DHEC believes equivalent performance should be demonstrated in areas with concentrations and component make up typical of southeast gulf and Atlantic coastal plain.

[71 FR 2764 §53.35(g)(4)]

The large acceptance ranges proposed for both Class II and Class III equivalence testing are excessive. Monitoring organizations must have confidence that methods used to collect data used for comparison to the NAAQS, in particular the 24-hour standards, provide data of sufficient quality to make a correct determination. The allowed differences the Equivalent and Reference measurements and resulting uncertainty in the measurement of those few higher concentration days will likely make the quality of a FRM measurement outweigh its higher cost and the advantages associated with continuous measurements.

SC DHEC recommends that the Class III limits for both PM_{2.5} and PM_{10-2.5} be at least as stringent as those set for Class II equivalent monitors. We also support the submission and reporting of one hour precision measurements as part of the required test data for assessment of the method.

[71 FR 2780 §58.10(a)(2)]

SC DHEC agrees that opportunity for public access, comment and timely review by the Regional Administrator is reasonable. Specific (and timely) guidance that is useful and practical and uses methods, tools and resources that are reasonably available to monitoring organizations is needed.

SCDHEC requests that the process anticipated in the event of disapproval of the plan be clarified.

[71 FR 2780 §58.10(b)]

The proposal indicates the annual monitoring network plan must contain cost information. Neither the purpose nor intended level of detail is indicated. The calculation of cost information serves no discernable use in the context of the annual monitoring network plan, and that portion of the network supported by federal funds is more appropriately addressed in the grant process.

SC DHEC recommends that the words '..cost information for the network and..' be removed from the section.

³[71 FR 2803 §53.1]

[71 FR 2780 §58.10(c)]

The proposal adds a monitoring plan requirement for consideration of air quality characterization for areas with relatively high populations of susceptible individuals and effect on data users other than the agency itself⁴. The standards are designed to be protective. The core monitoring network is designed to be representative of exposure. This requirement would be time consuming and costly (if not impossible) to adequately meet.

SC DHEC recommends removal of this section from the proposal and from the requirements for the annual monitoring plan.

[71 FR 2780 §58.10(d)]

It is reasonable for the plan to include a description the process used to provide for the public availability of the plan and proposed revisions required in §58.10(a)(1). There should be no need for public hearings unless the monitoring organization chooses to incorporate that opportunity in their review and revision process. Public hearings should not be required by the rule. EPA should reasonably expect that comments received during plans' public availability would be addressed in the revision provided to the Regional Administrator.

SC DHEC recommends removal of the reference to public hearings in the section and requirement for inclusion in the plan of any comments received during the public availability.

[71 FR 2780 §58.12(e)]

One in three day sampling for PM_{2.5} and one in six day sampling for PM₁₀ have proven to be adequate for comparison to the 24 hour standards. There is no compelling reason for the every day requirement for PM_{10-2.5}. Every third day sampling is sufficient for comparison to the standard and allows monitoring organizations to take advantage of efficiencies associated with a consistent unified sampling schedule.

SC DHEC requests that EPA change the sampling frequency requirement for PM_{10-2.5} from daily to the same one-in-three-day manual method requirement specified for PM_{2.5}.

[71 FR 2781 §58.15(a and b)]

Typically South Carolina ambient continuous monitoring data for the calendar year has been verified and is available in AQS by the May 1. This is not always the case for filter based measurements for mass and other components. The recent increased emphasis on additional validation and data analysis requires more time and may identify some reported values that need to be addressed. At all times, our most current data is available in AQS if needed.

SC DHEC recommends that EPA retain the current certification date and data summary reporting date of July 1 for the previous calendar year.

⁴ [71 FR 2780 §58.10(c)] The annual monitoring network plan must consider the ability of existing and proposed sites to support air quality characterization for areas with relatively high populations of susceptible individuals (e.g., children with asthma), and, for any sites that are being proposed for discontinuance, the effect on data users other than the agency itself, such as nearby States and Tribes or health effects studies.

[71 FR 2782 §58.20(a and d)]

This section states that after January 1, 2007 a monitor may be designated as a SPM 'only if it is a new monitor not previously included in the monitoring plan.' There may be occasions where a monitoring organization has a need to revisit a site to determine maintenance, progress, or trends of a particular parameter. It is not clear if 'plan' refers to any previous network monitoring plan and if that monitor, placed at a site where monitoring for that parameter had been done, can be designated SPM.

Similarly in (c), it is proposed 'All data from an SPM....which has operated for more than 24 months is eligible for comparison to the relevant NAAQS,...'. It is not clearly stated if a the data from a monitor replaced at a site used previously for the same parameter becomes eligible for comparison to the NAAQS after 24 months of data has been collected.

SC DHEC asks that EPA clarify their intent for application of the 24 month criteria to SPM data at one location.

[71 FR 2782 §58.30 (b)(1-5)]

We believe it is inappropriate with the current state of understanding of $PM_{10-2.5}$ concentrations, distribution and composition to constrain the investigation and application of the standard. The five criteria listed in this section potentially eliminate the protections afforded by the standard to populations who, by chance, live in a MSA or census block group that doesn't meet arbitrary and unrelated population benchmarks. Specific siting limitations may be found to be appropriate when additional data is available, but the constraints imposed by the five criteria in this section will limit the likelihood that SC DHEC and EPA will gather the mass indicator and $PM_{10-2.5}$ composition data from the range of areas, both urban and rural, that may be experiencing elevated concentrations. This variety of data will likely be a valuable resource for subsequent reviews.

SC DHEC requests that EPA minimize the use of unrelated population criteria, constraints on impacts of agriculture, mining and rural windblown dust and allow the monitoring organizations more flexibility to investigate potential exposure and apply the standard and provide for the resources necessary to collect sufficient data to support health studies, the next standard review and greater understanding of the health and welfare impact of $PM_{10-2.5}$.

[71 FR 2802 Part 58 Appendix D 4.7.4]

The EPA states 'Chemical speciation is encouraged at additional sites where the chemically resolved data would be useful in developing State implementation plans and supporting atmospheric or health effects related studies.' Unfortunately, the EPA has decided to cut a large portion of the funding for chemical speciation sampling other than the Speciation Trends Network (STN). The STN sites are placed for national objectives and may not be appropriate to address local and state needs. The proposed revisions to the standards for both $PM_{2.5}$ and $PM_{10-2.5}$ will make more complete understanding of particulate constituents increasingly valuable.

SC DHEC asks that EPA make additional resources available to monitoring organizations for speciation sampling and analysis in areas where they have utility for SIP development.

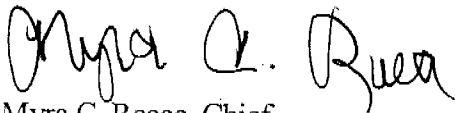
[71 FR 2803 Part 58 Appendix D 4.9]

SC DHEC agrees with the importance of maintaining at least a minimal archive of the PM filters. There is potential for further analysis of the captured material that may prove valuable for source apportionment research, toxics analysis, and support for SIP development. SC DHEC does not agree that the EPA or Regional Administrator alone should have the responsibility for determining the best use of this material.

SCDHEC requests the section be revised to reflect that the State has the responsibility for determining the best use of the archived filters and should make the material available to requesting organizations in consultation with the EPA

Thank you in advance for your time and consideration. If you have any questions or concerns regarding this information, please contact Robert Brown of my staff by telephone at (803) 898-4105 or email at brownrj@dhec.sc.gov.

Respectfully,

A handwritten signature in cursive script, appearing to read "Myra C. Reece".

Myra C. Reece, Chief
Bureau of Air Quality

cc: Kay Prince, EPA Region 4
Scott Reynolds, SCDHEC BES
Robert Brown, SCDHEC BAQ